

CARLA A. McCAULEY (State Bar No. 223910  
 carlamccauley@dwt.com  
 DAVIS WRIGHT TREMAINE LLP  
 865 South Figueroa Street, 24th Floor  
 Los Angeles, California 90017-2566  
 Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)  
 robbalin@dwt.com  
 LACY H. KOONCE, III (*pro hac vice*)  
 lancekoonce@dwt.com  
 SAMUEL BAYARD (*pro hac vice*)  
 samuelbayard@dwt.com  
 GEORGE WUKOSON (*pro hac vice*)  
 georgewukoson@dwt.com

DAVIS WRIGHT TREMAINE LLP  
 1633 Broadway  
 New York, New York 10019  
 Tel.: (212) 489-8230 Fax: (212) 489-8340  
 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado corporation,  
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LIMITED, a Hong Kong company;  
 SHENZHEN GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual, ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTVPAD LTD. COMPANY d/b/a  
 NEWTVPAD.COM a/k/a TVPAD USA, a  
 Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a E-  
 DIGITAL, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 MMM (AJWx)**

**STIPULATION RE  
 EXTENSION OF TIME FOR  
 DEFENDANTS CLUBTVPAD,  
 INC. AND BENNETT WONG  
 TO RESPOND TO INITIAL  
 COMPLAINT BY NOT MORE  
 THAN 30 DAYS (L.R. 8-3)**

Courtroom: 780  
 Judge: Hon. Margaret M. Morrow

Action Filed: March 13, 2015  
 New response date: May 4, 2015

This Stipulation is entered by and between Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH Network L.L.C. ("Plaintiffs") and Defendants Club TVpad, Inc. and Bennett Wong ("Club TVpad Defendants") through their respective counsel of record, with reference to the following facts:

1. Plaintiffs filed the Complaint in this action on March 13, 2015.

2. Plaintiffs personally served the Club TVpad Defendants on March 20, 2015, and therefore the earliest date on which the Club TVpad Defendants' responses to the Complaint would be due is April 10, 2015;

3. Plaintiffs have agreed to extend the time for the Club TVpad Defendants to respond to the Complaint to and including May 4, 2015;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Defendants Club TVpad Inc. and Bennett Wong shall have an extension of time up to and including May 4, 2015 to respond to the complaint in this action.

DATED: April 15, 2015

DAVIS WRIGHT TREMAINE LLP  
CARLA A. McCAULEY  
ROBERT D. BALIN (*pro hac vice*)  
LACY H. KOONCE, III (*pro hac vice*)  
SAMUEL BAYARD (*pro hac vice*)  
GEORGE WUKOSON (*pro hac vice*)

By: /s/ Carla A. McCauley  
Carla A. McCauley

Attorneys for Plaintiffs  
CHINA CENTRAL TELEVISION; CHINA  
INTERNATIONAL COMMUNICATIONS CO.,  
LTD.; TELEVISION BROADCASTS LIMITED;  
TVB HOLDINGS (USA), INC.; AND DISH  
NETWORK L.L.C.

DATED: April 15, 2015

RYU LAW FIRM

By: /s/ Francis S. Ryu  
Francis S. Ryu

Attorneys for Defendants  
ClubTVpad Inc. and Bennett Wong

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On April 16, 2015, I served the foregoing document(s) described as: **STIPULATION RE EXTENSION OF TIME FOR DEFENDANTS CLUBTVPAD, INC. AND BENNETT WONG TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)** by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

SEE ATTACHED SERVICE LIST

I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on April 16, 2015, at Los Angeles, California.

☒ Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Tania M. Moore  
Print Name

  
Signature

## SERVICE LIST

Francis S. Ryu, Esq. Ryu Law Firm 5900 Wilshire Blvd., Suite 2250 Los Angeles, CA 90036	Attorney for Club TVpad, Inc. and Bennett Wong
Mark Clark Traverse Legal, PLC 810 Cottageview Drive G-20 Traverse City, MI 49684	Attorneys for Asha Media Group, Inc. and Amit Bhalla
Timothy Wang Ni, Wang & Massand, PLLC 8140 Walnut Hill Lane, Suite 500 Dallas, TX 75231	Attorneys for newTVpad Ltd. Co. d/b/a newtvpad.com a/k/a TVpad USA
Jeff Lee LT Pacific Law Group LLP 17800 Castleton Street, #560 City of Industry, CA 91748	Attorneys for Honghui Chen, d/b/a e-Digital
John P. Fry, Esq. Benjamin Warlick, Esq. Morris Manning Y Martin LLP 3343 Peachtree Road, Suite 1600 Atlanta, GA 30326	Attorneys for Create New Technology (HK) Limited
Hua Yang International Technology Ltd Room 19c, Lockhart Rd., 301-307 Lockhart Rd., Wan Chai, Hong Kong, China	